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12   UNITED STATES DISTRICT COURT
13   CENTRAL DISTRICT OF CALIFORNIA
14

15 WILLIAM M. PATE, Acting Regional) Civil No. 2:15-cv-04228-GHK-AGR
   Director of Region 21 of the National)
16 Labor Relations Board, for and on   ) EX PARTE APPLICATION FOR AN
   behalf of the NATIONAL LABOR   ) ORDER SHORTENING TIME FOR
17 RELATIONS BOARD,   ) THE COURT TO HEAR THE
18   ) MOTION SEEKING LEAVE TO
) AMEND THE CORRECTED
19   Petitioner,   ) PETITION FOR TEMPORARY
) INJUNCTION UNDER SECTION
20   v.   ) 10(J) OF THE NATIONAL LABOR
) RELATIONS ACT, AS AMENDED
21 BODEGA LATINA CORPORATION,   ) [(29 U.S.C. SEC. 160(J)]
22 D/B/A EL SUPER,   )
) Date: No hearing required
23   Respondent.   )
) Judge: Honorable George H. King
24   )
) Courtroom: 650 Los Angeles, Roybal
25   )
26   )
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Pursuant to Local Rule 7-19, Petitioner respectfully submits this *ex parte* application for an Order Shortening Time so that Petitioner's Motion Seeking Leave to Amend the Corrected Petition for Temporary Injunction under Section 10(j) of the National Labor Relations Act, as Amended [29 U.S.C. Sec. 160(j)] with Supporting Exhibits may be heard on July 20, 2105, which is the scheduled hearing date for Petitioner's previously filed Corrected Petition for Temporary Injunction in this matter.

This proceeding involves Petitioner's request for injunctive relief under Section 10(j) of the Act. Petitioner initially filed a Petition and supporting documents in this proceeding on June 5, 2015, and thereafter filed a corrected version of those documents on June 9, 2015. Respondent filed its Opposition on June 22, 2015.

On July 6, 2015, Petitioner filed its Reply to Respondent's Opposition, as well as a Motion Seeking Leave to Amend the Corrected Petition for Temporary Injunction under Section 10(j) of the National Labor Relations Act, as Amended [29 U.S.C. Sec. 160(j)] with Supporting Exhibits, which seeks a deferred offer of reinstatement for Fermin Rodriguez instead of immediate interim reinstatement. As set forth in the Declaration of Ami Silverman, Respondent was notified of this amendment on July 6, 2015 as well as the filing of the Ex Parte Application. Respondent stated it objected to both filings. See Declaration of Ami Silverman ¶ 4.

Because the Petition for the temporary injunction is a pressing issue, Petitioner respectfully requests that the July 20, 2015 hearing for Petitioner's request for temporary injunction remain on July 20, 2015; that Petitioner's Motion Seeking Leave to Amend also be heard on July 20, 2015; that Respondent's opposition to the Motion Seeking Leave to Amend be filed and served no later than July 13, 2015; and that Petitioner's reply to the opposition be filed no later than July 16, 2015.

Pursuant to Local Rule 7-19, Petitioner hereby notifies the Court that the names and contact information of Respondent's counsel are as follows: Mark Theodore and Tracey Lynn Silver, Proskauer Rose LLP, 2049 Century Park East, Suite 3200, Los Angeles, California 90067; phone (310)557-2900; and e-mail addresses mtheodore@proskauer.com and tsilver@proskauer.com.

WHEREFORE, Petitioner respectfully moves this Court to sign the Order for Shortening Time so that the hearing date can remain on July 20, 2015 in this matter.

DATED at Los Angeles, California, this 6th day of July, 2015.

Submitted by,

/s/ Margaret W. Serrano
MARGARET W. SERRANO
Attorney for Petitioner
National Labor Relations Board